

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

RICHARD HENDERSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:10cv1503 AGF
)	
BILTBEST PRODUCTS, INC., et al.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF

Come now plaintiffs and move this Court for an injunction compelling defendants to:

1. immediately reinstate the terminated health care plan retroactive to the date of termination and maintain it for the term of the collective bargaining agreement; or, alternatively,
2. immediately reinstate the terminated health care plan retroactive to the date of termination and maintain it until the date it issues up-to-date Certificates of Creditable Coverage to each employee plaintiff;
3. immediately remit withheld child support and garnishment proceeds to the court systems and remit them timely in the future;
4. immediately reinstate the terminated 401(k) plan retroactive to the date of termination, timely remit employee and employer contributions to it and maintain the plan for the term of the collective bargaining agreement; and
5. immediately remit withheld union dues to the International and remit them timely in the future.

In support of this motion, plaintiffs refer the Court to their memorandum and affidavits filed contemporaneously herewith.

Respectfully submitted,

HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
Phone: (314) 727-1015
Fax: (314) 727-6804

/s/ Sherrie A. Schroder
SHERRIE A. SCHRODER, #4307
MICHAEL A. EVANS, #534636
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 3, 2010, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system and was hand-delivered with the summons, to the following non-participants in the Court's electronic filing system:

Timothy Stokes, President
Biltbest Products, Inc.
175 S. Tenth Street
Saint Genevieve, MO 63670

Timothy Stokes, Individually
Biltbest Products, Inc.
175 S. Tenth Street
Saint Genevieve, MO 63670

Timothy Stokes, Trustee
Biltbest Products, Inc. 401(k) Plan
175 S. Tenth Street
Saint Genevieve, MO 63670

/s/ Sherrie A. Schroder